

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
DELTA DIVISION

ZUNDRIA CRAWFORD

PLAINTIFF

VS.

CIVIL ACTION NUMBER 2: 06 CV 125 - MPM - SAA

BAXTER HEALTHCARE CORPORATION, ET. AL

DEFENDANTS

PLAINTIFF'S INITIAL CORE DISCLOSURE OF INFORMATION

COMES NOW, Plaintiff, Zundria Crawford, by and through her attorney, Brandon I. Dorsey, BRANDON I. DORSEY, PLLC, Post Office Box 13427, Jackson, Mississippi 39236 - 3427, and files this her core disclosure of information as required by Rule 26 (a) (1) of the Federal Rules Of Civil Procedure as follows:

(a) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information sufficiently to enable the opposing party to determine if a statement or deposition should be taken, including a witness who is retained or specifically employed to provide expert testimony in the case or whose duty as an employee of the party regularly involves giving expert testimony; provided, however, that an expert who has been retained or specifically employed by a party in anticipation of litigation or preparation for trial and who is not expected to be called as a witness at trial, need not be disclosed:

1. Zundria Crawford
25 Tolivar Cove
Post Office Box 681
Cleveland, Mississippi 38732

(b) a copy of all documents, data compilations, and tangible items in the possession, custody, or control of the disclosing party, that may be used to support its claims or defenses, unless solely for impeachment; provided, however, that if such documents, data compilations, and tangible items are voluminous, or if other circumstances make their production unduly burdensome or expensive, the party may describe by category and location all such documents, data compilations, and tangible things in its possession, custody or control and shall provide the opposing party a reasonable opportunity to review all such documents, data compilations and tangible items, at the site at which they are located or maintained.

1. Plaintiff would state that the time of filing this her initial disclosures, that she does not have any documentation showing such computations, however, she respectfully reserves the right to supplement this information

(c) A computation of any category of damages claimed by the party, making available for inspection and copying as under Rule 34 of the Federal Rules Of Civil Procedure, the documents or other evidentiary material on which such computation is based, including materials bearing on the nature and extent of injuries suffered, follows:

1. Plaintiff would state that the time of filing this her initial disclosures, that she does not have any documentation showing such computations, however, she respectfully reserves the right to supplement this information

Respectfully submitted,

ZUNDRA CRAWFORD, PLAINTIFF

BY: /s/ Brandon I. Dorsey
BRANDON I. DORSEY, MSB # 100291
ATTORNEY FOR PLAINTIFF

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Brandon I. Dorsey, attorney for the Plaintiff, does hereby certify that I have on this day caused to be served, via United States mail, postage prepaid, a true and correct copy of the above and foregoing document to the following person:

Paula Graves Ardelean, Esquire
BUTLER SNOW O'MARA STEVENS& CANNADA, PLLC
Post Office Box 22567
Jackson, Mississippi 39225 - 2567

SO CERTIFIED, this the 9th day of March of 2006.

/s/ Brandon I. Dorsey
BRANDON I. DORSEY